

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS, et al.,

*Plaintiffs,*

V.

GREG ABBOTT, et al.,

*Defendants.*

CIVIL ACTION NO.  
21-CV-00259-DCG-JES-JVB  
[lead case]

TREY MARTINEZ FISCHER, Texas State Representative (HD 116),

*Plaintiff,*

V.

GREG ABBOTT, in his official capacity as Governor of the State of Texas; JOHN SCOTT, in his official capacity as Secretary of the State of Texas,

*Defendants.*



CIVIL ACTION NO.  
3:21-CV-00306  
[consolidated case]

PLAINTIFF TREY MARTINEZ FISCHER, VERONICA ESCOBAR'S, AND DEFENDANT'S  
JOINT MOTION TO EXTEND TIME

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES PLAINTIFFS TREY MARTINEZ FISCHER and CONGRESSWOMAN  
VERONICA ESCOBAR, plaintiffs in the above styled and numbered causes file this agreed to

motion for extension of time to respond and to reply to the dispositive motions filed by defendants on August 14, 2014.

### **BACKGROUND**

On March 14, 2022, the Defendants have filed a 12 (b) 6 motion seeking to dismiss Plaintiff Martinez Fischer's case in the above-styled cause of action. *See* Dkt. 205 - DEFENDANTS' MOTION TO DISMISS PLAINTIFF TREY MARTINEZ FISCHER'S ORIGINAL COMPLAINT. By the rules of the Western District of Texas, the response would be due on March 28, 2022. Counsel for Plaintiff Martinez Fischer is currently working on an emergent election matter in Hidalgo County and requires more time to adequately respond to the motion to dismiss.

The Defendants have agreed to this extension of time. In consideration thereof, the Defendants require more time to respond to Congresswoman Escobar's Original Complaint. Any answer or dispositive motion to Congresswoman Escobar's original complaint is due on April 6, 2022.

Because of the prior engagements, the parties have mutually agreed to the following schedule as to the motions to dismiss:

- 1) Plaintiff Trey Martinez Fischer will respond to Defendant's pending motion to dismiss on April 4, 2022.
- 2) Defendants will file a responsive pleading to Congresswoman Escobar's Original Complaint by April 13, 2022.

Based on the foregoing, Plaintiff and Defendants ask this Court to extend the times in this action as set out above.

DATED: March 28, 2022

Respectfully submitted,

/s/ Martin Golando  
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Counsel for Defendants

**CERTIFICATE OF SERVICE**

I certify that on this, the 28th day of March, 2022 in accordance with the Federal Rules of Civil Procedure, a true and correct copy of the foregoing document was served, via ECF, to the counsel of record in this cause of action.

/s/ Martin Golando  
Martin Golando